

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA)	
)	Criminal Case No. 1:21-cr-123-LM-01
)	
v.)	Counts 1-3: Bank Fraud
)	(18 U.S.C. § 1344)
MARY BAIRD, a/k/a Marybeth Baird,)	
Taylor Baird, Taylor Barrett, or Mary)	Counts 4-6: False Representation of a Social
Beard,)	Security Number
)	(42 U.S.C. § 408(a)(7)(B))
Defendant)	
)	Counts 7-8: Attempted Bank Fraud
)	(18 U.S.C. §§ 1344, 1349)
)	
)	Counts 9-10: Aggravated Identity Theft
)	(18 U.S.C. § 1028A)

INDICTMENT

The Grand Jury charges:

Background Information

At all times relevant to this Indictment:

1. Citizens Bank is a financial institution as defined by Title 18, United States Code, Section 20, the deposits of which are insured by the Federal Deposit Insurance Corporation (“FDIC”).
2. Citizens Bank has branch locations in multiple states, including New Hampshire, Rhode Island, Michigan, and Ohio.

The Scheme and Artifice to Defraud

3. Beginning on an unknown date, but at least by on or about September 5, 2020, and continuing through May 13, 2021, in the District of New Hampshire and elsewhere, the defendant,

MARY BAIRD,

knowingly and willfully executed and attempted to execute a scheme and artifice to defraud Citizens Bank. BAIRD entered Citizens Bank branch locations in New Hampshire and other states and regularly presented means of identification and Social Security numbers belonging to Citizens Bank account holders, but that she falsely purported belonged to her. BAIRD attempted to cash fraudulent checks addressed to those account holders or withdraw funds from their accounts.

COUNTS ONE THROUGH THREE

Bank Fraud
18 U.S.C. § 1344

4. On or about the dates charted below, BAIRD executed and attempted to execute the scheme by cashing fraudulent checks naming Citizens Bank customers as payees by entering the Citizens Bank branch offices listed below, and impersonating each listed account holder by presenting their personal identifying information, including their name and Social Security number, and often a counterfeit Passport card.

Count	Date	Location	Victim	Transaction	Amount
1	09/09/20	Bedford, NH	J.K.	Check cashed	\$4,990.00
2	09/09/20	Manchester, NH	J.K.	Check cashed	\$4,990.00
3	09/09/20	Goffstown, NH	S.H.	Check cashed	\$2,500.00

All in violation of Title 18, United States Code, Section 1344.

COUNTS FOUR THROUGH SIXFalse Representation of a Social Security Number
42 U.S.C. § 408(a)(7)(B)

5. The Grand Jury realleges paragraphs 1 through 4.

6. On or about the dates charted below, in the District of New Hampshire and elsewhere, the defendant,

MARY BAIRD,

for the purpose of obtaining for herself and any other person anything of value from any person, and for any other purpose, did, with intent to deceive, falsely represent numbers to be the Social Security number assigned by the Commissioner of Social Security to her. Specifically, BAIRD cashed fraudulent checks at Citizens Bank with Social Security numbers on the reverse side when, in fact, such numbers were not the Social Security number assigned by the Commissioner of Social Security to her.

Count	Date	Location	Victim
4	09/09/20	Bedford, NH	J.K.
5	09/09/20	Manchester, NH	J.K.
6	09/09/20	Goffstown, NH	S.H.

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNTS SEVEN AND EIGHT

Attempted Bank Fraud
18 U.S.C. §§ 1344, 1349

7. The Grand Jury realleges paragraphs 1 through 3.

8. On or about the dates charted below, in the District of New Hampshire and elsewhere, the defendant,

MARY BAIRD,

executed and attempted to execute the scheme by attempting to either cash fraudulent checks naming Citizens Bank customers as payees or withdraw funds belonging to Citizens Bank customers. BAIRD entered the Citizens Bank branch offices listed below and impersonated an account holder by presenting personal identifying information of the account holder, including his name and purported driver's license, which contained the account holder's personal identifying information.

Count	Date	Location	Victim	Transaction	Amount
7	05/13/21	Nashua, NH	S.K.	Attempt to cash check	\$4,990.00
8	05/13/21	Nashua, NH	S.K.	Attempt to withdraw cash	\$2,000.00

COUNTS NINE AND TEN
Aggravated Identity Theft
18 U.S.C. § 1028A

9. The Grand Jury realleges paragraphs 1 through 3, 7, and 8.

10. On or about the dates charted below, in the District of New Hampshire and elsewhere, the defendant,

MARY BAIRD,

during and in relation to the felony violation of attempted bank fraud in violation of Title 18, United States Code, Sections 1344 and 1349, knowingly possessed and used, without lawful authority, means of identification—namely, a purported Massachusetts driver’s license containing the name, date of birth, and address—of another person.

Count	Date	Location	Victim
9	05/13/21	Nashua, NH	S.K.
10	05/13/21	Nashua, NH	S.K.

All in violation of Title 18, United States Code, Section 1028A.

NOTICE OF FORFEITURE

The allegations in Counts One through Three and Seven through Ten are realleged for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 982(a)(2). Upon conviction, the defendant shall forfeit to the United States pursuant to 18 U.S.C. § 982(a)(2) any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

All in accordance to 18 U.S.C. § 982(a)(2) and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL

Dated: July 26, 2021

/s/ Foreperson
FOREPERSON

JOHN J. FARLEY
ACTING UNITED STATES ATTORNEY

By: /s/ Alexander S. Chen
Alexander S. Chen
Special Assistant U.S. Attorney